

1 HONORABLE ROBERT S. LASNIK  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 DIRECT SOURCE SEAFOOD LLC, a  
11 Washington limited liability company,

12 Plaintiff,

13 v.

14 AQUA STAR (USA) CORP., a Washington  
15 corporation; and DOES 1-20, inclusive,

16 Defendants.

17 Case No. 2:16-cv-00407-RSL

18 STIPULATION AND [PROPOSED] ORDER  
19 OF DISMISSAL

20 NOTE ON MOTION CALENDAR:  
21 March 24, 2017

22 Plaintiff Direct Source Seafood LLC (“DSS”) and Defendant Aqua Star (USA) Corp.  
23 (“Aqua Star”) hereby stipulate as follows:

24 1. DSS filed its Complaint in this action on March 18, 2016, asserting federal and  
25 state law claims relating to Aqua Star’s use of DSS’s CHEF’S NET trademarks. (See Dkt. 1.)  
26 Aqua Star filed its Answer to DSS’s Complaint on April 13, 2016, in which it also asserted a  
27 counterclaim for declaratory relief regarding the validity of DSS’s CHEF’S NET trademarks.  
(See Dkt. 19.)

28 2. The parties have agreed to entry of the [Proposed] Permanent Injunction Against  
29 Defendant Aqua Star (USA) Corp. in the form attached to the parties’ Stipulation for Entry of  
30 Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal.

31 3. The parties have further agreed that, upon entry of the [Proposed] Permanent  
32 Injunction Against Defendant Aqua Star (USA) Corp. by the Court, this action—including all

1 claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs  
2 to either party.

3 SO STIPULATED TO AND AGREED BY:

4 Dated: March 24, 2017

FOCAL PLLC

5 By: s/ Venkat Balasubramani

6 s/ Stacia N. Lay

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11 Attorneys for Plaintiff

13 Dated: March 24, 2017

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23 Attorneys for Defendant

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1 claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs  
2 to either party.

3 | SO STIPULATED TO AND AGREED BY:

4 Dated: March   , 2017

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5/

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STIPULATION AND [PROPOSED] ORDER OF DISMISSAL  
(Case No. 2:16-cv-00407-RSL) - 2

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## ORDER

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED THAT:

1. Having entered the Permanent Injunction Against Defendant Aqua Star (USA) Corp. pursuant to the parties' stipulation for Entry of Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal, this action—including all claims and counterclaims asserted therein—be dismissed with prejudice.

2. The parties shall bear their own attorneys' fees and costs.

IT IS SO ORDERED.

DATED this 28<sup>th</sup> day of March, 2017

MJS Casick

Robert S. Lasnik  
United States District Judge